

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Reading Division**

Chapter 13

Case No. 25-10751-pmm


In re:

Bonnie Lynn MacDonald,
Debtor.

_____ /

**EMERGENCY MOTION TO LIFT THE ONE-YEAR BAR IMPOSED BY
ORDER OF DISMISSAL**

COMES NOW the Debtor, **Bonnie Lynn MacDonald**, and respectfully moves this Honorable Court to **vacate the one-year bar to refiling** imposed by the Order of Dismissal entered on **March 20, 2025**, and as grounds therefore states as follows:

U.S. BANKRUPTCY COURT
2025 JUL 29 P 2:28
FILED


I. BACKGROUND

1. The Debtor filed a voluntary Chapter 13 petition on **February 25, 2025**.
2. The case was dismissed on **March 20, 2025**, and the dismissal order imposed a **one-year bar to refiling**, likely pursuant to 11 U.S.C. §§ 109(g) or 362(d)/(c)(4).
3. At the time of the prior case, Debtor was experiencing significant personal and financial hardship and was unable to comply with filing obligations and plan confirmation requirements.

II. EXTRAORDINARY CIRCUMSTANCES

4. Debtor has experienced a series of life-altering and tragic events, including:
 - The **death of my son** on or about **November 28th, 2007**.

- The **closure of my construction company in 2008**, which had been her main source of income.
 - A **serious automobile accident on July 21, 2023**, causing physical injury, resulting in an extended stay in physical rehabilitation and loss of transportation.
 - Severe disruption of employment and hardship due to the **COVID-19 pandemic**.
 - October 15th, 2024, I fell and nicked an artery in her spleen, causing blood loss complications.
 - February 2025, dental treatment resulted in the loss of a high volume of blood, which resulted in a diagnosis of anemia, requiring a transfusion, followed by (8) iron infusions.
5. These circumstances, individually and collectively, created an exceptional burden on Debtor and her ability to properly prosecute her previous Chapter 13 case.

III. CHANGED CIRCUMSTANCES AND GOOD FAITH

6. Debtor has since experienced a **significant change in financial condition and life stability**, enabling her to proceed in **good faith**.
7. Her Social Security Retirement monthly income is just under \$1800.00.
8. Additionally, she works selling final expense insurance and has been realizing \$2,000.00 to \$9,000.00 monthly income.
9. She also drives for LYFT Carsharing and earns approximately \$1,000.00 weekly.
10. Based on her current income and budgeting, Debtor **believes she can make all required payments** and bring a new Chapter 13 case to a successful conclusion **with the assistance of counsel**.

IV. LEGAL GROUNDS FOR RELIEF

9. The Court has authority under **11 U.S.C. § 105(a)** and **Federal Rule of Bankruptcy Procedure 9024** to vacate or modify orders in the interest of justice, particularly when new facts arise or upon showing of excusable neglect.

10. Courts have recognized that a bar to refiling may be lifted where a debtor demonstrates **changed circumstances, good faith, and imminent harm** if relief is denied.

V. EMERGENCY NATURE OF THE MOTION

11. Debtor is facing imminent and irreparable harm, including foreclosure, eviction, repossession, and garnishment.

WHEREFORE, the Debtor, Bonnie Lynn MacDonald, respectfully prays that this Honorable Court:

1. **GRANT** this Emergency Motion.
2. **VACATE** the one-year bar to refiling imposed by the Order of Dismissal entered on or about March 20, 2025;
3. **AUTHORIZE** the Debtor to immediately file a new Chapter 13 bankruptcy petition or, if applicable, reinstate the previously dismissed case;
4. **SCHEDULE** this matter for an expedited hearing, if necessary, due to the imminent and irreparable harm facing the Debtor;
5. And grant such other and further relief as this Court deems just and proper.

Dated: 7/29, 2025

Respectfully submitted,



Bonnie Lynn MacDonald
531 S. Warminster Road
Hatboro, PA 19040
267-239-7484
BonnieMacDonald@Proton.com

CERTIFICATE OF SERVICE

Re: In re Bonnie Lynn MacDonald, Case No. 25-10751-pmm

I, the undersigned, hereby certify that on _____, 2025 I caused a true and correct copy of the **Emergency Motion to Lift the One-Year Bar Imposed by Order of Dismissal** to be served to the **Court by hand delivery and to the** following parties:


Name	Email Address	Party / Representation
Denise Elizabeth Carlton	bkgroup@kmlawgroup.com	On behalf of U.S. Bank Trust Company, National Association, as Trustee
Kenneth E. West	ecfemails@ph13trustee.com philaecf@gmail.com	Chapter 13 Trustee
United States Trustee	USTPRegion03.PH.ECF@usdoj.gov	Office of the U.S. Trustee

TOTAL SERVED: 3

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 7/29, 2025

Respectfully submitted,



Bonnie Lynn MacDonald
531 S. Warminster Road
Hatboro, PA 19040
267-239-7484
BonnieMacDonald@Proton.com

Label Matrix for local noticing
0313-2
Case 25-10751-pmm
Eastern District of Pennsylvania
Philadelphia
Tue Jul 22 20:34:05 EDT 2025

Philadelphia
900 Market Street
Suite 400
Philadelphia, PA 19107-4233

Abington Rehabilitation Assoc., LLC
2510 Maryland Road, Suite 150
Willow Grove, PA 19090-1143

CACH, LLC
P.O. Box 10497
Greenville, SC 29603-0497

Credit Collection Services
725 Canton Street
Norwood, MA 02062-2679

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Jefferson Health
833 Chestnut Street, Suite 115
Philadelphia, PA 19107-4401

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

MERRICK BANK
Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Main Line Emergency Med Assoc.
56 W Main Street, Suite 305
Christiana, DE 19702-1503

Montgomery County SPCA
19 E. Ridge Pike
P.O. Box 222
Conshohocken, PA 19428-0222

New Jersey E-2 Pass Violations Processing Ct
P.O. Box 4971
Trenton, NJ 08650-4971

(p)NJ EZPASS
ATTN ATTN NJ EZPASS/ JASMINE JENKINS
375 MCCARTER HIGHWAY
SUITE 200
NEWARK NJ 07114-2562

PA Turnpike Toll by Plate
P.O. Box 645631
Pittsburgh, PA 15264-5254

Patient First
P.O. Box 718941
Philadelphia, PA 19171-8941

Pennsylvania Heart & Vascular Grp
/Aria Health
P.O. Box 780102
Philadelphia, PA 19178-0102

Philadelphia Fire Department
P.O. Box 1280
Oaks, PA 19456-1280

Radiology Associates of the Main Line, PC
PO BOX 678678
Dallas, TX 75267-8678

Rheumatic Disease Associates, LTD
2360 Maryland Road
Willow Grove, PA 19090-1709

SEPA Horsham
P.O. Box 826499
Philadelphia, PA 19182-6499

Santander Consumer USA
P.O. Box 660633
Dallas, TX 75266-0633

Select Portfolio Servicing, Inc.
PO BOX 65250
Salt Lake City, UT 84165-0250

Tower Health
P.O. Box 16051
Reading, PA 19612-6051

U.S. Bank Trust Company, National Assoc.
c/o KML Law Group, P.C.
701 Market Street
Suite 5000
Philadelphia, PA 19106-1541

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107-4202
KENNETH E. WEST
Office of the Chapter 13 Standing Trustee
190 N. Independence Mall West
Suite 701
Philadelphia, PA 19106-1552

Upper Moreland Township
117 Park Avenue
Willow Grove, PA 19090-3299

Bonnie Lynn MacDonald
531 S. Warminster Road
Hatboro, PA 19040-4029

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Dept of Treasury
Internal Revenue Service
Philadelphia, PA 19255-0030

New Jersey Turnpike Authority
Ramon de la Cruz, NJ Turnpike Authority
1 Turnpike Plaza, P.O Box 5042
Woodbridge, NJ 07095

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(u)U.S. Bank Trust Company, National Associat	End of Label Matrix	
	Mailable recipients	27
	Bypassed recipients	1
	Total	28